

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
	:	Case No. 19-24636-GLT
Jerome Donald Boyd,	:	
Debtor	:	Chapter 13
_____	:	
	:	
Jerome Donald Boyd,	:	Claim. No. 3
Movant	:	
	:	
v.	:	Hearing Date:
	:	
	:	
Nationstar Mortgage LLC d/b/a Mr. Cooper and	:	
Ronda Winnecour, Trustee	:	
Respondents	:	
_____	:	

**DECLARATION**

I, Albert G. Reese Jr., Esquire, attorney for the above-referenced Debtor, hereby submit this formal written Declaration that the existing Chapter 13 Plan is sufficient to fund the plan with the modified debt for the following reason:

Pursuant to Nationstar Mortgage LLC d/b/a Mr. Cooper's Notice of Mortgage Payment Change filed on September 27, 2022, the Debtor's current escrow payment for account number ending in **2205** is **\$0.00-No Change**. The new escrow payment is **\$0.00-No Change**. The current mortgage payment is **\$2,047.58**. The new mortgage payment is **\$1,361.28** effective June 1, 2022.

Dated: **October 31, 2022**

Respectfully submitted by:  
**/s/ Jerome Donald Boyd**  
**Jerome Donald Boyd**

Dated: **October 31, 2022**

Respectfully submitted by:  
**/s/ Albert G. Reese, Jr., Esquire**  
Albert G. Reese, Jr., Esquire  
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